



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 Sixth Avenue  
Seattle, Washington 98101


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7/3/03

Reply To  
Attn Of: ECO-083

**MEMORANDUM**

**SUBJECT:** Pacific Sound Resource: Determination of the Suitability of Dredged Material from Tyee Yacht Club Maintenance Dredging Project (Corps Permit 2002-2-001323) for Capping Material

**FROM:** John Malek, Team Leader   
Sediment Management Program  
Aquatic Resources Unit

**TO:** Sally Thomas, Remedial Project Manager

1. The Tyee Yacht Club proposes to maintenance dredge 2300 cubic yards of sediment from its moorage basin at Eagle Harbor, Bainbridge Island, Washington. They have applied for and received the appropriate Department of the Army permits from the Seattle District, Regulatory Branch (2002-2-001323). As part of the permitting process, the material was characterized pursuant to the guidance and requirements of the Dredged Material Management Program (DMMP), of which EPA is a member agency. The DMMP agencies completed and signed a Determination of Suitability, dated May 27, 2003, for the project (attached). The DMMP determination was for proposed disposal at the DMMP open water site in Elliott Bay, which was the subject of the permit request. The primary record supporting the Determination of Suitability is located at the Seattle District office; however, copies of primary documents (Sampling and Analysis Plan and Data Report) are also filed in the Aquatic Resources Unit (PERM 205c 2.02 Tyee Yacht Club Maintenance Dredging) at the Region.

2. The remedy for the Pacific Sound Resources Superfund project includes construction of a sediment cap. The remedy anticipated that dredged material(s) determined to be suitable for construction of the cap remedy could become available during construction (either from Corps dredging projects or private projects permitted by the Corps) and should be able to be accepted and used by EPA for the selected remedy. (Appendix F of the *Final Design Submittal, Pacific Sound Resources Superfund Site, Marine Sediment Unit, Seattle Washington*, dated February 3, 2002 presents design drawing and example specifications to be used in construction of the sediment cap; material specification for Dredged Cap Material are provided in attachment F-1.) The characterization protocols used by the DMMP agencies to determine suitability for permit actions are appropriate for characterizations under Superfund, in this instance as capping material

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at the Pacific Sound Resources site. As appropriate permits/permissions must be secured to dredge any sediments, EPA decided that the most efficient protocol would be to review such projects after such approvals are completed for suitability of the material for use with the Pacific Sound Resources remedy. No permit is needed for discharge at the Superfund site if the material is accepted by EPA. Clean dredged material (that meets the specifications for capping) would be placed as cap material, in accordance with the design plans under Corps oversight. Because barge loads of dredged material are not identical, the Corps may exclude or reject individual dredged material management units or barge loads.

3. EPA (Justine Barton) reviewed the characterization performed for the DMMP agencies leading to the DMMP Suitability of Determination. I have reviewed the DMMP determination and primary documents with regards to the type of material needed by EPA for use as cap material. Particular attention was paid to the grain size composition of the dredged material in addition to the chemical nature of the material. Based on this evaluation, I conclude that the dredged material from the Tyee Yacht Club project is suitable for use as cap material at the Pacific Sound Resources site and can be accepted for that purpose.

Effective: June 9, 2003

Attachment

cc: Justine Barton, EPA  
Corps DMMO(Stephanie Stirling)  
Corps HTRW (Miriam Gilmer)

27 May 2003

**MEMORANDUM FOR RECORD**

**SUBJECT: DETERMINATION OF THE SUITABILITY OF DREDGED MATERIAL TESTED UNDER DMMP EVALUATION PROCEDURES FOR TYEE YACHT CLUB MAINTENANCE DREDGING PROJECT (2002- 2-001323, DAIS # TYEE-1-A-F-185) WITH PROPOSED DISPOSAL AT THE ELLIOTT BAY OPEN WATER DISPOSAL SITE.**

1. The Tyee Yacht Club proposes to maintenance dredge 2300 cubic yards of sediment from its moorage basin at Eagle Harbor, Bainbridge Island, Washington. The following summary reflects the DMMP agencies (Corps of Engineers, Department of Ecology, Department of Natural Resources and the Environmental Protection Agency) consensus decision on the acceptability of the sampling plan and all relevant test data to make a determination of suitability for the disposal of the material at a PSDDA open-water disposal site.
2. The DMMP agencies ranked this project "low-moderate" based on information provided by the applicant and a review of known sources of contamination in the area. This ranking is documented in an e-mail from David Kendall dated 21 October 2002.
3. A sampling and analysis plan was completed for this project and approved by the DMMP agencies on 17 March 2003. Sampling for this project was performed on 28 March 2003.

SAP approval date	17 March 2003
Sampling date	28 March 2003
Data Report submittal date	May 2003
Recency determination dates	28 March 2008 – 28 March 2010

4. Samples were taken from three locations and composited for one surface analysis. The sampling and compositing plan is presented in Table 1. Z-samples were collected and archived for this project. Based on the chemistry results, the z-samples were not analyzed.
5. There were no exceedances of 2002 DMMP screening levels for the standard list of chemicals of concern. All detection limits were below screening levels. The sample was also analyzed for porewater tributyltin. It was not detected in the sample. The analytical laboratory failed to analyze the sample for ammonia. Given the grain-size of the sediment, and the lack of bioassays, this did not impact decision-making for this project.

6. In summary, the DMMP-approved sampling and analysis plan was followed, and quality assurance, quality control guidelines specified by the DMMP were generally followed. The data gathered were deemed sufficient and acceptable for regulatory decision-making under the DMMP program. Based on the results of the chemical testing, the consensus determination of the DMMP agencies is that 2300 cubic yards of material from the Tyee Yacht Club maintenance dredging project are suitable for open-water disposal at either a dispersive or nondispersive site.
7. This memorandum documents the suitability of proposed dredged sediments for disposal at a PSDDA open water disposal site or for beneficial use. It does not constitute final agency approval of the project. A dredging plan for this project must be completed as part of the final project approval process. A final decision will be made after full consideration of agency and public input, and after an alternatives analysis is done under section 404 (b) 1 of the Clean Water Act.

**Tyee Yacht Club**  
**2002- 2-01323**

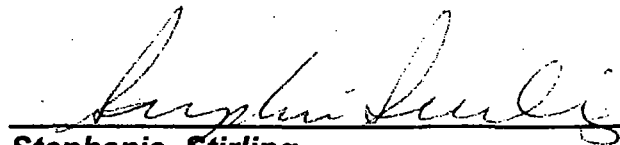
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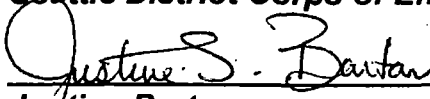
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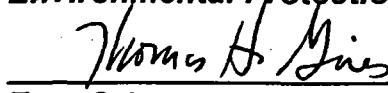
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**Stephanie Stirling**  
**Seattle District Corps of Engineers**

  
**Justine Barton**  
**Environmental Protection Agency, Region 10**

  
**Tom Gries**  
**Washington Department of Ecology**

  
**Peter Leon**  
**WA Department of Natural Resources**

**Copies Furnished:**

EPA/Justine Barton  
DOE/Tom Gries  
DNR/Peter  
CENWS/OD-RG/Randell Perry

**Table 1. Sampling and Compositing Plan**

DMMU	Sample Station	Sample Interval
DMMU 1	AN-01	0-7.8 feet <sup>1</sup>
	AN-02	0-7.5 feet
	AN-03	0-9.3 feet

1. Sampling depth includes one-foot over depth and one-foot z-sample.

**Table 2. Summary of chemical and biological testing results**

			DMMU ID	1
			Rank	LM
	Units			Conc.
Total Solids	%			71.1
Total Volatile Solids	%			2.9
Total Organic Carbon	%			2.1
Total Ammonia	mg/kg			
Total Sulfides	mg/kg			130J
Gravel	%			9.5
Sand	%			78.0
Silt	%			8.0
Clay	%			4.4
Fines (percent silt + clay)	%			12.4
preferred reference match	%			
BITs exceeded				no
PSDDA Determination				P

Figure 1. Sampling Locations

